

EXHIBIT 2

9/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Melanie Kambadur

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,)	
Individual and Representative)	
Plaintiffs,)	CASE NO.
)	3:23-cv-03417-VC
-against-)	
)	
Meta Platforms, Inc.,)	
Defendant.)	
)	

*** HIGHLY CONFIDENTIAL ***

ATTORNEYS' EYES ONLY

VIDEO-RECORDED DEPOSITION OF
MELANIE KAMBADUR

Cooley, LLP
55 Hudson Yards
New York, New York 10001

09/17/2024
9:07 a.m. (EDT)

REPORTED BY: MONIQUE CABRERA

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

9/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Melanie Kambadur

Page 69

1

2

3

A. Yes.

4

Q. Who was that person?

5

A. Nikolay Bashlykov.

6

Q. And he lives in London?

7

A. I'm not actually sure where he

8

lives. He works from the London office.

9

10

11

A. No.

12

13

14

15

MR. WEINSTEIN: Object to form.

16

A. I don't recall.

17

BY MR. YOUNG:

18

19

20

21

Would that be fair to say?

22

A. I don't know if I would say it that.

9/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Melanie Kambadur

Page 70

1 We said he worked on pre-processing the data,
2 that is fair to say.

3 Q. What is pre-process -- processing?
4 Excuse me.

5 A. That means transforming the data
6 with a series of steps that make it more suitable
7 for training models.

8 Q. Does that include removing -- strike
9 that.

10 What kind of steps would be involved
11 in pre-processing?

12 A. Are you asking specifically for
13 Llama models or more generally?

14 Q. Yeah, for the whole Llama models.

15 A. I don't know all the steps. But for
16 example, we perform various types of
17 de-duplication. We tokenize the data, which
18 means -- yeah, we tokenize the data. We chunk
19 the data into spans of text.

20 Q. Let's talk about de-duplication. So
21 if the models -- if a model is trained or
22 pre-trained on the same text over and over again,

9/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Melanie Kambadur

Page 337

1 CERTIFICATE OF SHORTHAND REPORTER NOTARY PUBLIC

2 I, Monique Cabrera, the officer
3 before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of
6 the testimony given; that said testimony was
7 taken by me stenographically and thereafter
8 reduced to typewriting under my direction;
9 and that I am neither counsel for, related
10 to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto
14 set my hand this 17th day of September, 2024.

15
16
17 
18

19 MONIQUE CABRERA

20 Notary Public in and for the State of New York

21 County of Suffolk

My Commission No.

22 Expires: 06/12/2026